

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION**

RAUL CHAPA AND ELOISA CHAPA	§	
VS.	§	Civil Action 1:15-cv-00045
STATE FARM LLOYDS	§	

**PLAINTIFFS' MOTION FOR JUDGMENT ON
DEFENDANT'S OFFER OF JUDGMENT**

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW RAUL CHAPA AND ELOISA CHAPA, Plaintiffs in the above-numbered and entitled civil action, and move this court to render a judgment against the Defendant STATE FARM LLOYDS for the sum of \$9,500.00, and in support hereof state the following:

1. On or about July 20, 2015, pursuant to Rule 68 of the Federal Rules of Civil Procedure, the Defendant offered by written notice served on the Plaintiffs to permit judgment against it in the amount of \$9,500.00 (nine thousand five hundred and no/100 dollars) inclusive of all costs now accrued, interest, attorney's fees and any other amount that may be awarded to Plaintiffs pursuant to statute or rule.

2. On or about July 23, 2015, the Plaintiffs notified the Defendant, in writing, that they were accepting the Defendant's offer to permit judgment against Defendant dated July 20, 2015.

3. On or about August 14, 2015, the Plaintiffs filed, with the clerk of the court, a copy of the Defendant's offer of judgment and a copy of the Plaintiffs' acceptance of the offer together with proof of service of the acceptance.

Now, therefore, the Plaintiffs request that the court render a final judgment in this civil action upon said Offer and Acceptance, for the sum of \$9,500.00 inclusive of costs, interest, and attorney's fees, and that such judgment be entered in the records of this case. A form of the judgment requested by Plaintiffs is attached hereto as **Exhibit "A"**.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs pray that this court render a final judgment in this civil action against Defendant for the sum of \$9,500.00 inclusive of costs, interest, and attorney's fees, and grant such other and further relief as they may show themselves justly entitled to.

Respectfully submitted,

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By: _____

JOSE R. GUERRERO

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ATTORNEY FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I, Jose R. Guerrero, certify that on August 19, 2015, a true and correct copy of this **PLAINTIFFS' MOTION FOR JUDGMENT ON DEFENDANT'S OFFER OF JUDGMENT** was served on David R. Stephens, One Riverwalk Place, 700 N. St. Mary's Street, San Antonio, Texas 78205, Attorney for Defendant via telephonic document transfer to (210) 227-4602.



JOSE R. GUERRERO